



American Association of
State Highway and
Transportation Officials

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David L. Winstead, President
Secretary
Maryland Department
of Transportation

Francis B. Francois
Executive Director

December 22, 1997

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Secretary:

Enclosed are an original and nine copies of AASHTO's comments in response to the Second Notice of Proposed Rulemaking WT Docket 96-86 concerning The Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010.

Do not hesitate to inform me should you have comments or questions regarding this submittal.

Very truly yours,

Francis B. Francois
Executive Director

FBF:LAM:tcd

cc: Chester Jones
Jan Machis

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of)	
)	
The Development of Operational,)	
Technical and Spectrum Requirements)	WT Docket 96-86
For Meeting Federal, State and Local)	
Public Safety Agency Communication)	
Requirements Through the Year 2010)	
)	

Comments of the

American Association of State Highway and Transportation Officials

Francis B. Francois, Executive Director

and the Association's

Special Committee on Communications

Chester Jones, Chairman

December 22, 1997

Before the
Federal Communications Commission
Washington, DC 20554

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Public Safety Agency Communication)	
Requirements Through the Year 2010)	
)	

Establishment of Rules and Requirements
For Priority Access Service

Second Notice of Proposed Rule Making

To: The Commission

COMMENTS

The American Association of State Highway and Transportation Officials (AASHTO) respectfully submits these comments to the Commission's Notice of Proposed Rule Making in the above captioned proceeding.

AASHTO is the national association of the state departments of highways and transportation in the 50 states, the District of Columbia and Puerto Rico. Its scope includes all five principal transportation modes, and its major purpose is to foster development, operation and maintenance of an integrated national transportation system.

AASHTO, through its Special Committee on Communications, has been involved in matters related to radio frequency communications and associated systems for more than 40 years.

AASHTO serves as the Commission's certified frequency coordinator for the Highway Maintenance Radio Service. AASHTO is an active member of the Intelligent Transportation Society of America (ITSA) with membership on many ITSA committees, including the ITSA Telecommunications Committee.

POSITION STATEMENT

In this proceeding, the Commission makes a range of proposals relating to public safety communications in the 746-806 MHz spectrum band and in general. AASHTO participated in the activities of the Public Safety Wireless Advisory Committee and is a member of the National Public Safety Telecommunications Council and generally concur with the positions of both organizations. AASHTO has also consulted with other public safety associations and is responding to this Notice as one of the joint commenters. The purpose of these comments is to address issues for which further elaborations is warranted in order to fully express the position of the AASHTO Member Departments.

AASHTO supports a national planning methodology for the assignment and licensing of the frequencies in the 746-806 MHz band which are allocated to the Public Safety Radio Service. This plan should define operational policies on a national level. The development of this plan must allow and encourage input from all levels of public safety organizations. Mutual Aid and Interoperability Channels must be established. Rules for the usage of these channels must be established on a nationwide basis and should be flexible in order to maximize the benefit of mutual aid and inter agency operations.

Interoperability is of paramount importance for the protection of life and property. To limit interoperability to a restricted number of public safety groups would be counterproductive.

All public safety agencies, their contractors, and those private services providing unique support operations should be allowed to intercommunicate directly through the mutual aid or interoperability channels. The Commission's Rules should not only allow the implementation of "shared resource" systems, they should encourage the proliferation of such systems. Utility company work crews often work along side public safety personnel in responding to a natural and man made disasters. The ability for these workers to communicate directly at the scene enhances recovery operations and mitigates the loss of life and property.

The Nevada Department of Transportation, one of the Association's Member Departments, is currently constructing a "shared resource" telecommunications system which includes the Department, utility companies, State governmental agencies, cities as well as Federal governmental agencies. Benefits to the participants in this system include reduced costs resulting from the sharing of mountain top transmitter sites and associated infrastructure.

FREQUENCY COORDINATION

The Commission has determined that competition between frequency coordinators is desired for the frequency bands below 512 MHz. AASHTO contends that it would be inconsistent for the Commission to propose any other system for the 746-806 MHz band. In fact if the frequencies are assigned in accordance with a national plan, any of the current Public Safety Frequency Coordinators would be equally capable of furnishing coordination services to all applicants. The multiple coordinator approach would then be consistent with the current process for the frequency bands below 512 MHz.

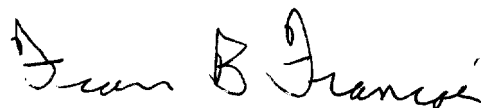
CONCLUSION

AASHTO supports the allocation of additional spectrum for public safety agencies. It is

imperative that this allocation be accompanied by a regulatory framework which allows the rapid proliferation of systems utilizing this spectrum. Flexible operational rules along with competitive frequency coordination should assist the end user of telecommunications systems to provide the maximum service to its constituents at the lowest possible cost.

We respectfully request that the Commission consider and act favorably on these comments as it proceeds with this important undertaking.

Respectfully submitted

A handwritten signature in cursive script, reading "Francis B. Francois".

Francis B. Francois, Executive Director
American Association of State Highway and
Transportation Officials

Date 12-22-97